

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

THE UNITED STATES OF AMERICA,
ET AL.

PLAINTIFFS

v.

CASE NO. 3:12cv790-TSL-RPM

THE CITY OF JACKSON, MISSISSIPPI

DEFENDANT

JOINT MOTION TO REOPEN CASE

Plaintiffs United States of America and the State of Mississippi, and Defendant, City of Jackson, Mississippi, (collectively the “Parties”) jointly move to reopen this case. For cause, the movants show as follows:

1. On March 1, 2013, this Court entered a Consent Decree between Plaintiffs United States of America and the State of Mississippi and Defendant the City of Jackson, Mississippi, in the above-captioned case. *See* Dkt. No. 10.
2. That same day, this case was closed administratively. *See* ECF docket.
3. The Consent Decree states that the Court retains jurisdiction over certain matters. Specifically, the Consent Decree provides:

The Court shall retain jurisdiction over this case until termination of this Consent Decree, for the purpose of resolving disputes arising under this Consent Decree or entering orders modifying this Consent Decree, pursuant to Sections XII [Dispute Resolution] and XIX [Modification], or effectuating or enforcing compliance with the terms of this Consent Decree.

See Dkt. No. 10 ¶ 101.

4. The Consent Decree remains in effect and has not been terminated pursuant to Section XX (Termination) of the Consent Decree.
5. Earlier this year, the parties filed joint status reports in this case informing the Court of negotiations among the parties to the Consent Decree with regard to a possible material modification to the Consent Decree. *See* Dkt Nos. 12; 14.
6. Consistent with the Court's retained jurisdiction under Paragraph 101 of the Consent Decree, the Parties now move to reopen this case for consideration of a Joint Motion for Confidentiality Order, which the parties intend to file after the case is reopened, and to apprise the Court of significant developments in this case.
7. The Parties request relief from the obligation to file a memorandum brief in support of this motion pursuant to Rule 7(b)(4) of the Local

Uniform Civil Rules of the United States District Courts for the
Northern and Southern District of Mississippi. *See* L. U. Civ. R. 7(b)(4).

CONCLUSION

Movants request that the Court reopen this case, so that they may seek
appropriate relief.

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Dated: November 30, 2021

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